



April 12, 2024

Honorable Brett H. Ludwig
U.S. District Court for the Eastern District of Wisconsin
517 East Wisconsin Avenue
Milwaukee, WI 53202

Re: Lee, Jr., Michael A. v. Ambasan, Gina
Case No. 2:22-CV-00930

Dear Judge Ludwig:

We are responding concerning the progress of discovery in this matter. There was an exchange of discovery requests in February. The parties agree to mediate the matter to hopefully avoid expensive discovery. The mediation happened in March but did not settle the case. Thereafter, discussions happened to schedule depositions. We agreed to produce our client for a zoom deposition at 3:30 on April 29th. We were told that was unacceptable because the questioning would take 7 hours to complete. We felt such a long deposition needed to be in person. The parties agreed to a deposition here on April 29th (enclosed April 4th email from Ms. Motley) which I confirmed on April 5th. (enclosed email). Ms. Motley then filed the motion on the 5th. We got it on the 8th. The Court entered an order on the 10th while I was on vacation. I apologize to the Court for the delay. We will follow the Court's order.

Very truly yours,

DEVINE HAHN, S.C.

Thomas M. Devine
tdevine@devinehahn.com

TMD/dlr
Enc.

cc: Kimberly Motley, Motley Legal
Gina Amasan

Darcy Redding

From: kmotley motleylegal.com <kmotley@motleylegal.com>
Sent: Thursday, April 04, 2024 5:06 PM
To: Thomas M. Devine
Cc: Darcy Redding
Subject: Re: Subpoenas to DOC

No worries. We can conduct the depositions in Milwaukee which actually works better.

From: Thomas M. Devine <tdevine@devinehahn.com>
Sent: Thursday, April 4, 2024 4:59 PM
To: kmotley motleylegal.com <kmotley@motleylegal.com>
Cc: Darcy Redding <dredding@devinehahn.com>
Subject: RE: Subpoenas to DOC

My client can make the 29th at 9. I can make this depo but the notice is to conduct the deposition remotely. You need a stipulation under Rule 30(4) and Rule 29. I have not agreed to remote depositions.

From: kmotley motleylegal.com [mailto:kmotley@motleylegal.com]
Sent: Thursday, April 04, 2024 3:15 PM
To: Thomas M. Devine <tdevine@devinehahn.com>
Subject: Re: Subpoenas to DOC

Hello Atty. Devine,

I have not heard anything with regards to my emails of April 1st regarding depositions for third parties. Additionally, I have also heard nothing back regarding deposing your client on April 29th at 9am.

I will assume that all the dates are fine and plan to continue to set on a few more depositions. If I hear nothing back by 4pm on April 5th I assume all of the previously scheduled depo dates are fine.

Regards,
Kim

From: kmotley motleylegal.com <kmotley@motleylegal.com>
Sent: Monday, April 1, 2024 5:04 PM
To: Thomas M. Devine <tdevine@devinehahn.com>
Subject: Subpoenas to DOC

Attached are subpoenas we sent to DOC.

We have tentatively scheduled Latasha Lott for her depo on April 30 at 9am which may change depending on her availability.

--
Best,

Kim

Kimberley Cy Motley, Esq.
C.E.O. / Founding Partner
Motley Legal Services
Afghan Mobile : 93 (0) 788 887 887
Intl. Number : 1 (704) 765 - 4887
US Mobile : 1 (704) 763-5413
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Darcy Redding

From: Thomas M. Devine
Sent: Friday, April 05, 2024 2:40 PM
To: kmotley motleylegal.com
Cc: Darcy Redding
Subject: RE: Subpoenas to DOC

I believe we have agreed that my client will not be remote. The deposition can take place at my office. Other depositions depend on the circumstances

From: kmotley motleylegal.com [mailto:kmotley@motleylegal.com]
Sent: Thursday, April 04, 2024 5:24 PM
To: Thomas M. Devine <tdevine@devinehahn.com>
Cc: Darcy Redding <dredding@devinehahn.com>
Subject: Re: Subpoenas to DOC

Hello Attorney Devine,

I just want to make clear that you are not approving remote depositions in this matter. If I am mistaken, please clarify if you

- 1) will stipulate for remote depositions of your client, AND
- 2) if you will stipulate for remote depositions for 3rd parties.

I look forward to receiving your answer by 2:00p.m. tomorrow April 5, 2024. Thank you in advance.

Warm regards,
Kim

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To: kmotley motleylegal.com <kmotley@motleylegal.com>
Cc: Darcy Redding <dredding@devinehahn.com>
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